

**To:** Rothery, Deirdre[Rothery.Deirdre@epa.gov]  
**From:** Morales, Monica  
**Sent:** Tue 6/21/2016 7:39:54 PM  
**Subject:** FW: APPROVED for OMB - 'Federal Implementation Plan for Existing Oil and Natural Gas Sources; Uintah and Ouray Indian Reservation in Utah' (5872)

What have we said already regarding timing?

Monica S. Morales

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**From:** Stewart, Lori  
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**To:** Morales, Monica <[Morales.Monica@epa.gov](mailto:Morales.Monica@epa.gov)>  
**Cc:** Cyran, Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>  
**Subject:** RE: APPROVED for OMB - 'Federal Implementation Plan for Existing Oil and Natural Gas Sources; Uintah and Ouray Indian Reservation in Utah' (5872)

Monica, as I read through these talkers, they make a great case for why this rule is important, but I don't see much on the time-sensitivity. Is there anything else Janet can say about the need to expedite interagency review? Thanks.

**From:** Morales, Monica  
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**Subject:** APPROVED for OMB - 'Federal Implementation Plan for Existing Oil and Natural Gas Sources; Uintah and Ouray Indian Reservation in Utah' (5872)

Hi Lori – Here are some talking points for Janet for Region 8's draft proposed U & O FIP. We of course would like OMB's review as soon as possible, but would ask that Janet request at most a 30-day turn-around as was done for the national O&G rules. Thanks and please let me know if you need anything else from us.

*Air Quality/Public Health:*

- Our preliminary 3-year design value for Ozone in the Basin is 81 ppb, based on 2014-16 data. The Ozone NAAQS is 70.
- During the February 2016 inversion, we saw 8 hour ozone values in the basin as high as 120 ppb. This is a very high level that is representative of very unhealthy air quality.

*Role of Emissions from Oil & Gas Facilities on U&O*

- About 92% of (non-biogenic) VOCs in the Uinta Basin are from oil & gas operations and 80% of those VOCs are from sources in Indian country.
- Based on operator-submitted source registration data, more than 95% of sources in Indian country within the Uinta Basin are not currently regulated. These minor sources emit 98% of the VOCs on Indian country in the Basin and total about 63,000 tons per year (tpy). Again, 95% of sources on the U&O Reservation are not currently regulated.
- This is in contrast to oil and gas operations on state lands that have to meet minor source permitting requirements.
- National oil and gas rules will not specifically address air quality issues in Indian Country, because they do not address emissions from existing sources. However, EPA does have the authority to develop an area-specific rule if needed.

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## Goals of a FIP

- Development of a Reservation-specific FIP will accomplish five important goals in the Uinta Basin.
  - First, the FIP would reduce VOC emissions from existing oil and gas sources.
  - Second, the FIP would be consistent with Utah's requirements for existing oil and gas sources on state land and create a level playing field for industry.
  - Third, given the current compromised air quality in the Uinta Basin, having enforceable restrictions in place to reduce emissions from existing sources will help industry demonstrate that new proposed sources will not cause or contribute to exceedances of the ozone standard, thus allowing new sources of emissions within the U&O Reservation.
  - Fourth, is to get emission reductions in the basin as soon as possible and in advance of a non-attainment designation process. Implementing the FIP to get VOC reductions sooner rather than later will help to make attainment by 2020 more likely, if the Uinta Basin is designated non-attainment.
  - A FIP will help protect public health and the environment on the Uintah and Ouray Reservation, as well as meet EPA's tribal trust responsibility.

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**From:** Stewart, Lori

**Sent:** Monday, June 20, 2016 1:06 PM

**To:** Morales, Monica <Morales.Monica@epa.gov>  
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**Subject:** FW: APPROVED for OMB - 'Federal Implementation Plan for Existing Oil and Natural Gas Sources; Uintah and Ouray Indian Reservation in Utah' (5872)

Monica, I don't think we have met but I am Janet McCabe's Chief of Staff. Our understanding is that you'd like to ask OMB to expedite review of the this O&G FIP proposal. Janet plans to call Dom Mancini about this. Can you please share some talking points regarding the time pressures, the review time requested, etc. for Janet's use on her call to OMB? Thanks very much.

**From:** Adams, Darryl  
**Sent:** Monday, June 20, 2016 1:34 PM  
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Today, OP approved R08's Federal Implementation Plan for Existing Oil and Natural Gas Sources; Uintah and Ouray Indian Reservation in Utah (5872) for transmission to OMB for interagency review. This tier 3 NPRM has been submitted to 'ROCIS'. ADP Tracker has been updated. The screen shot is below.

RIN:

2008-AA02 (201610)

Stage of  
Rulemaking:

Proposed Rule Stage

Title:

Federal Implementation Plan for Oil and Natural Gas Production Facilities on the Uintah and Indian Reservation in Utah



EO Review Package was successfully submitted at 06/20/2016 13:31:39 PM.

## EO Review Pac

### Unfunded Mandates

No

Darryl Adams

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